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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

CATHERINE FERRARO,

Plaintiff,

v.

KILOLO KIJAKAZI, ACTING
 COMMISSIONER OF SOCIAL SECURITY,

Defendant.

CASE NO.
 2:23-cv-00575-ART-BNW

**SECOND UNOPPOSED MOTION
 FOR EXTENSION OF TIME TO FILE
 PLAINTIFF'S BRIEF**

Plaintiff, Catherine Ferraro by her attorney, moves for an additional thirty (30) day extension of time to file Plaintiff's opening brief by October 12, 2023. Plaintiff's opening brief is currently due to be filed September 15, 2023. This is Plaintiff's second request for an extension in this matter. On July 14, 2023, this court granted Plaintiff's first motion for an extension of time (Dkt. No. 11).

Counsel requests this extension due to two briefing attorneys leaving Counsel's office within the last few weeks. This has necessitated a complete reorganization and reassignment of the attorney's schedules. Further, Counsel has explored the possibility of reassignment, but is unable to do so due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. These circumstances do not allow for Plaintiff's Counsel to properly prepare the brief by the current deadline. This request will not

1 cause Defendant any undue hardship. This extension is needed to thoroughly and properly
2 prepare the brief by the current deadline.

3 Wherefore, Plaintiff requests an extension from September 15, 2023, up to and including
4 October 12, 2023 to file her brief. Counsel for the Plaintiff has conferred with Defendant's
5 Counsel who has no objection to this request.
6

7 Dated September 10, 2023

8 Respectfully submitted,

9 /s/Hal Taylor
10 Hal Taylor, Esq.

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12 **Plaintiff's Certificate of Service:**

13 I certify that I caused the Second Unopposed Motion for Extension of Time to be served
14 today, September 10, 2023, by CMECF to Blaine T. Welsh, Esq., and Oscar Gonzalez, Esq., who
15 are filing users of the CM/ECF system.
16

17 /s/Hal Taylor
18 Hal Taylor

19 Good cause being found, Plaintiff's second motion to extend time is **GRANTED**. The opening
20 brief shall be filed no later than October 12, 2023.

21 **IT IS SO ORDERED**

22 **DATED:** 3:54 pm, September 12, 2023

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24 

25 **BRENDA WEKSLER**
26 **UNITED STATES MAGISTRATE JUDGE**
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